

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
                                  )  
                                  )  
Plaintiff,                   )  
                                  )  
                                  )  
v.                             )   No.     4:19-CR-968-RLW-SPM  
                                  )  
                                  )  
ANGELO MAGIC,               )  
                                  )  
                                  )  
Defendant.                   )

**MOTION FOR PRETRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Allison H. Behrens, Assistant United States Attorney for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1.       Defendant is charged with two counts of robbery of a commercial establishment, in violation of Title 18, United States Code, Section 1951(a). During each robbery, Defendant used a firearm to rob a pizza delivery person of his product and personal items. The victims, fearing for their safety, provided those items to the Defendant.

2.       In addition, Defendant is charged with two counts of brandishing a firearm in furtherance of a violent felony. Each count carries with it a mandatory minimum sentence of seven years and a maximum term of life imprisonment, to run consecutively to each other and to all other sentences. Thus, a rebuttable presumption of detention exists in this case.

3.       The Government's investigation has also revealed that it appears Defendant has additionally used a firearm to rob delivery persons of their product, money and personal items in

numerous other occasions, including Insomnia Cookies in February 2019 and Insomnia Cookies in June 2019.

4. Accordingly, there are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person and the community.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN  
United States Attorney

*s/ Allison H. Behrens*  
ALLISON H. BEHRENS, #38482(MO)  
Assistant United States Attorney